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8 Attorney for the Defendant
9 TARUN VERMA

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11 IN THE UNITED STATES DISTRICT COURT
12 EASTERN DISTRICT OF CALIFORNIA
13

14 UNITED STATES OF AMERICA,
15
16 Plaintiff,

17 v.

18 TARUN VERMA
19
20 Defendants.

CASE NO. 5:24-PO-00062 CDB

DEFENDANT TARUN VARMA'S
REQUEST AND ORDER TO APPEAR
VIA ZOOM

21 Tarun Verma, by and through his counsel of record, Monica L. Bermudez, hereby request the
22 following:

- 23 1. By previous order, this matter is currently scheduled for a status conference on November 5,
24 2024, at 10:00 a.m. before the Honorable Christopher Baker.
- 25 2. Mr. Verma is a citizen of India.
- 26 3. Mr. Verma was granted an L-1¹ Visa to work at American Express in the United States.
- 27 4. Mr. Verma's contract with American Express was terminated early.
- 28 5. Mr. Verma was under the belief, but it was not confirmed, that upon learning of the violation,

¹ The L-1A nonimmigrant classification enable a U.S. employer to transfer an executive or manager from one of its affiliated foreign offices to one of its offices in the United States.

American Express terminated his contract.

6. Upon termination of his contract, Mr. Verma was further informed by American Express' legal counsel that the L-1A Visa status allows for a 60-day non-immigrant grace period and was tied to active employment in the United States.

7. Mr. Verma sought out an employment law attorney to see if he could challenge the termination.

8. He was advised by the attorney that he had no recourse as he was an at-will employee.

9. Mr. Verma believed it was in his best interest to return to India prior to the 60-day grace period so that he would not be in violation of his L-1A Visa status.

10. Moreover, Mr. Verma did not want to jeopardize his chances of possibly returning to the United States in the future.

11. Mr. Verma has agreed to enter into a plea of guilty to the current charge or the modified charge if the United States Attorney is still in agreement. The United States Attorney's Office, however, is requiring a fine of \$2,000 to paid in full, \$10 dollar mandatory special assessment, \$30 processing fee if it applies, and appellate waiver. No probation as Mr. Verma is no longer in the country.

12. Mr. Verma does not have the current ability to pay the entire fine.

13. Mr. Verma recognizes the importance of the charges. It is not his intention to evade the Court.

14. As such, counsel is requesting Mr. Verma be allowed to appear via video conference.

DATED: October 31, 2024

/s/ Monica L. Bermudez
MONICA L. BERMUDEZ
Counsel for Defendant
TARUN VERMA

ORDER

For good cause appearing based on counsel's representations regarding Defendant's background and current circumstances, IT IS SO ORDERED Defendant Tarun Verma is authorized to appear for the status conference and anticipated change of plea via video/Zoom teleconference on November 5, 2024, at 10:00 a.m.

IT IS SO ORDERED.

Dated: **November 4, 2024**


UNITED STATES MAGISTRATE JUDGE